



*Office of Laboratory Licensure,
Certification & Training*

3443 N Central Avenue, Suite 810
Phoenix, Arizona 85012
(602) 255-3454
(602) 255-1070 FAX
Technical Support Hot-Line 1-800-592-0374
E-Mail: acharyp@azdhs.gov

Jane Dee Hull, Governor
James R. Allen, MD, MPH, Director

Information Update

**March 27, 1997
Update # 35**

1. This is an update on the externalization of EPA's Water Laboratory Performance Evaluation Programs WP, WS and DMR ([Information Update #34](#), dated December 30, 1996). The Environmental Laboratory Advisory Board (ELAB) PT Committee has written a letter of concern to EPA after becoming aware of rumors during the NELAC II (National Environmental Laboratory Accreditation Conference II) Interim Meeting concerning immediate externalization of proficiency programs. The PT Committee also understood that there was discussion concerning destroying samples prepared for distribution in January 1998. The following information are the excerpts from a ELAB PT Committee letter to the EPA.
 - Such an action is contrary to the Legislative mandate to EPA to protect the public health.
 - On-site certification programs vary from state to state and the EPA Performance Evaluation Program (PEP) is the only program in common nationwide that provides technically reliable performance samples essential to insuring the quality of environmental laboratory data.
 - EPA PEP externalization plan should mirror the NELAC Proficiency Testing Program with the EPA serving the same role as NELAC, incorporating its standards into the design. NELAC has requirements for a multi-provider Performance Evaluation Program. NELAC would function as the Standard Setting Authority and would have a single PT Provider Oversight Body reporting to the Standard Setting Authority. EPA could enter into a contractual agreement with an organization such as NIST to serve as the PT Provider Oversight Body. This would allow the EPA to serve only as the Standard Setting Authority until such time that NELAC standards are adopted, and following a transitional period when the program can be incorporated into NELAP (National Environmental Laboratory Accreditation Program).
 - A concern of the committee is that the NELAC standards cannot be passed until July 1997 at the earliest. Implementation of NELAP is estimated to take 2-4 years as it is a voluntary program of the states, federal agencies and territories. Many feel this is an optimistic estimate for the 49 Drinking Water primacy states to elect to participate in a new certification program. The Performance

Evaluation Program Externalization Options published in the July 18, 1996 Federal Register committed the EPA to supporting the programs until 2000.

- The PT Committee's recommendation was:

The Committee recommends that the EPA retain the current PEP as is until the year 2000 or until such a time that the NELAC PT Provider Oversight Body standards have been approved and an Oversight Body has been established and is operational. Otherwise the committee is concerned that the EPA will not allow enough time for a smooth, timely transition to a technically reliable Performance Evaluation Program.

- The Committee continues working to evaluate issues concerning EPA's externalization of the Performance Evaluation Program.
2. Arizona is represented on the NELAC PT Committee and has collated comments from the Public Health Directors of other states, Arizona government officials as well as from the Arizona Laboratory Association and forwarded the comments to the members of the ELAB PT Committee, NELAC PT Committee and to the members of the Association of State and Territorial Public Health Laboratory Directors (ASTPHLD).

3. **Q:** Can a laboratory analyze a drinking water compliance sample for thallium by using Standard Method 3113B?

A: No. The EPA has not yet promulgated 3113B for thallium in drinking water. This is because the precision and accuracy data has not been completed for thallium by this method.

4. Some clarification regarding cyanide analyses in drinking water, waste water and ground water:

EPA defines "Amenable" as free cyanide and only total and amenable methods are approved for waste water and drinking water.

In promulgating the MCL for cyanide in the National Primary Drinking Water Regulations, EPA states that the MCL for cyanide applies to "free cyanide" (or cyanides amenable to chlorination). There is a specific EPA approved analytical method for "free" cyanide. However, EPA also has approved the use of "total" cyanide analytical methods because they are adequate to screen samples for the presence of cyanide. Where total cyanide levels are greater than the MCL, the analysis for "free" cyanide should be performed to determine whether there has been an MCL exceedance.

The Arizona Department of Environmental Quality (ADEQ) has clarified that the aquifer water quality standards for cyanide applies to "free" cyanide. However, by adding the phrase "as free cyanide", ADEQ does not intend to limit the use of "total" cyanide analytical methods for initial screening of ground water. If cyanide is detected in ground water using the total cyanide methods, then an analysis for free cyanide should be performed to determine compliance with the aquifer water quality standard.

SM 4500 CN-I is a "weak acid dissociable" cyanide method. This has been referred to as "free" cyanide, however, it is not an EPA approved method and should not be used for compliance monitoring.

5. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A [table of contents](#) to all the Information Updates published is also available.

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